



**Hoffmann-La Roche**

Hoffmann-La Roche Inc.  
340 Kingsland Street  
Nutley, New Jersey 07110-1199

**John D. Alexander**  
Assistant General Counsel  
(201) 235-3447

**January 4, 1996**

**Mr. Joseph Cosentino, OSC  
Removal Action Branch/USEPA - Region II  
Emergency & Remedial Response Division  
2890 Woodbridge Avenue  
Edison, NJ 08837**

**Re: Request for Information Pursuant to Section §104(e) of CERCLA, 42 U.S.C. §9604(e); Bayonne Barrel & Drum, Superfund Site, 150-154 Raymond Boulevard, Newark, Essex County, New Jersey**

Dear Mr. Cosentino,

This letter will constitute the response of Hoffmann-La Roche Inc. to the §104(e)(i) information request noted above. We apologize for the delay.

- 1(a) The name of the company is Hoffmann-La Roche Inc.
- 1(b) Roche is a New Jersey corporation, founded in 1928.
- 1(c) The President, CEO, and Chairman of the Executive Committee of the Board of Directors of Hoffmann-La Roche Inc. is Patrick Zenner. Please direct any correspondence to him through the office of the undersigned.
- 1(d) All wholly owned subsidiaries of Roche are listed on Attachment A. Please note that Roche also owns a substantial stake in Laboratory Corporation of America, a portion of which business was formerly a wholly owned subsidiary doing business as Roche Biomedical Laboratories Inc. Hoffmann-La Roche is a wholly owned subsidiary of Roche Holdings Inc. a Delaware corporation.
- 1(e) Not applicable.
- 1(f) Not applicable.
2. As a result extensive efforts interviewing all current employees in positions and with experience to likely have knowledge of container treatment, disposal and storage practices, as well as reviewing all records reasonably related to this topic, Roche



can state that it has no corporate knowledge or documents to indicate any business relationship with Bayonne Barrel and Drum.

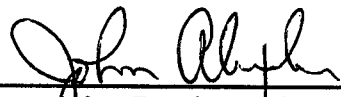
3. Roche knows of no person having knowledge of facts involving Roche use of the Bayonne Barrel and Drum facility.
4. Our internal inquiry was focused on four key departments, Purchasing, Environmental & Safety Affairs, Engineering and Law. The Purchasing Department handles commercial relations with all outside vendors. Persons consulted in the Purchasing Department and responding in the negative included Giles Breault, Jan LaPorta and Ed O'Neill. Environmental Affairs routinely inspects all disposal vendors for suitability for use and compliance with regulatory and Roche standards. William Kay, Ken Zinis, Tom Schuyler, Jose Garcia, Tom Deutsch and Dr. Jack Kace were all consulted and responded in the negative. The Engineering Department operates various aspects of the Roche waste disposal system, including all recycling operations and on-site and off-site disposal. Engineering representatives responding in the negative include Steve Marga, Joe Simmons, Matt Krysik, Chandra Patel and Denis Freel. The undersigned coordinated the search for the Law Department for files involving Bayonne Barrel & Drum, and was ably assisted by Donna Sherman. No files or other evidence of use of Bayonne Barrel & Drum was discovered.

Please note that we would be most willing to review any documents or information in possession of USEPA, which might further focus our search for Roche records.

5. Given the lack of contract or other agreement with Bayonne Barrel and Drum, there exists no indemnification agreement either. If the question pertains to Roche insurance policies, we do not feel such a question is relevant or permissible under CERCLA. If USEPA can point to specific statutory language or case law supporting its right to ask such a question, please contact the undersigned.
6. See number 5.

Very truly yours

HOFFMANN-LA ROCHE INC.

By   
John D. Alexander  
Assistant General Counsel

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c: Mr. Marc Seidenberg/USEPA  
Ms. Suzanne Becker/USEPA

Subsidiaries of Hoffmann-La Roche Inc. (Direct and Indirect)

HLR Service Corporation	Delaware
Cintichem, Inc.	Delaware
RPSC Inc.	New York
HLR Sciences, Inc.	New Jersey
Lab Delivery Service of New York City Inc.	New York
HLR Enterprises Inc.	Delaware
Roche Medical Electronics Inc.	New Jersey
HLR Holdings Inc.	Delaware
Rorad, Inc.	New Jersey
Technad Inc.	New Jersey
Roche Carolina Inc.	South Carolina
Roche Laboratories Inc.	Delaware
Roche Diagnostic Systems, Inc.	New Jersey
Roche Pharma, Inc.	Delaware
Roche Molecular Systems, Inc.	Delaware
Roche Sales Corporation	Barbados
Roche Image Analysis Systems, Inc.	Delaware

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey

County of Essex

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Dr. Jack Kace

NAME (print or type)

Vice President

Environmental & Safety Affairs

TITLE (print or type)

Jack Kace

SIGNATURE

Sworn to me before this

4<sup>th</sup> day of JANUARY, 1996

John D. Alexander

Notary Public

JOHN D. ALEXANDER

An Attorney at Law of New Jersey.

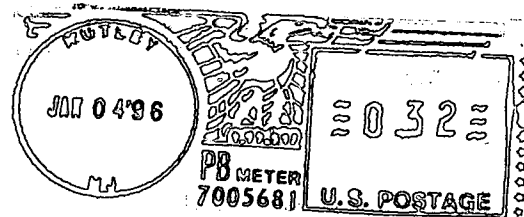
Roche

**Hoffmann-La Roche**

A Member of the Roche Group

Hoffmann-La Roche Inc.  
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Nutley, New Jersey 07110-1199

**John D. Alexander, Esquire**  
Law Department 85/7



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